

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DAVID WILLIAMS, ADRIAN BROWN and
HILBURN WALKER, on behalf of
themselves and all others similarly situated,

Case No. 15-cv-5610 (AKH)

Plaintiffs,

-against-

EPIC SECURITY CORP. and SELWYN
FALK,

Defendants.

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**DECLARATION OF LAURA M. CATINA IN SUPPORT
OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

LAURA M. CATINA, pursuant to the provisions of 28 U.S.C. § 1746, hereby declares
under the penalties of perjury that the following is true and correct:

1. I am a member of the law firm of Condon Catina & Mara, PLLC, attorneys for
Defendants, EPIC Security Corp. and Selwyn Falk, in the above-referenced matter. I am fully
familiar with the facts and circumstances surrounding this matter based upon a review of the file
maintained by this office in the ordinary course of business and discussions with our clients.

2. I submit this Declaration to transmit to the Court the following exhibits:

- A. Plaintiff's Complaint filed on July 17, 2015.
- B. Defendant's Answer filed on August 12, 2015.
- C. Plaintiffs' First Amended Complaint filed on August 18, 2017.
- D. Defendants' Answer to Plaintiffs' First Amended Complaint filed on
September 11, 2017.
- E. Relevant portions of deposition transcript of Mark J. Lerner, PhD.
- F. Relevant portions of deposition transcript of Selwyn Falk.

- G. Class Notice.
- H. Payroll records for Plaintiff David Williams.
- I. Certification of Selwyn Falk.
- J. Relevant portions of deposition transcript of David Williams.
- K. Relevant portions of deposition transcript of James Foster.
- L. Relevant portions of deposition transcript of Michael Moulton.
- M. Relevant portions of deposition transcript of Adrian Brown.
- N. Deposition transcript relating to Jonathan Seguro.
- O. Relevant portions of deposition transcript of Aronolph Henriques.

For the reasons set forth in the accompanying Memorandum of Law, the Defendants respectfully request that the Court grant their motion for summary judgment in its entirety and grant such other and further relief as the Court deems just and proper.

Dated: Nanuet, New York
January 26, 2018

s/ Laura M. Catina
LAURA M. CATINA